

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: May 8, 2001

ITEM: ATT 2-11 Provide the fully discounted price that Verizon, or its purchasing subsidiary or affiliate, has paid to manufacturers for its ten most recent purchases of the line terminals where drop cables are spliced to distribution cables. Indicate the number of lines served by such terminals, and provide any other information necessary to determine the cost per line of such terminals. To the extent there are a range of sizes of such devices that are used in different situations, provide the total and per-line cost of each size commonly deployed by Verizon. Also, to the extent the per-line price depends on such factors as whether it is pedestal- or pole-mounted, serves business and residential customers, is used indoors or outdoors, and the like, provide sufficient information to determine such dependencies. Provide all available data and documentation -- invoices, purchase orders, work papers, and so on -- that substantiate this information.

REPLY: Verizon MA objects to this question on the grounds that it overly broad, burdensome, and not reasonably calculated to lead to admissible evidence. Notwithstanding this objection, Verizon MA provides the following response.

Please see the attached contracts, including price lists, for line terminals that are purchased by Verizon MA. Contract No. X07248C is between Telesector Resources Group, Inc. and Hub Fabricating Co., while Contract No. BA16599 is between Bell Atlantic Network Services and Raychem Corporation. Verizon MA considers this information to be proprietary and confidential and will provide this information to parties subject to the terms of a mutually acceptable Protective Agreement.

VZ # 72

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Dinell Clark
Title: Staff Director

REQUEST: AT&T Communications of New England, Set #5

DATED: May 17, 2001

ITEM: ATT 5-5 Referring to Part CA Exhibit Page 1 of 2 and to Part CA Workpaper 5.0, please provide supporting documentation for the capacities and quantities selected for each of the following components in each of the Metro, Urban, Suburban, and Rural zones:

- a) Microprocessor Plant
- b) Rectifiers
- c) Batteries
- d) Automatic Breaker
- e) Power Distribution Service Cabinet
- f) Emergency Engine

REPLY: Verizon MA's power engineers provided the quantities and capacities that would be required in the design of four categories (metro, urban, suburban and rural) of power plants reflected in workpapers referenced in the question.

The power engineers sized the power plant by using historical data for a typical office in each density zone. This power plant is used to provide DC power to a switching system and its support equipment. Based on this information the number of rectifiers and battery strings was determined. The number of rectifiers was based on the greater of N+1 or N+20% (BA790-600-200). Strings of batteries were determined by using a 3 hour reserve time (BA 790-600-200) at MVPC 1.88 (BA 790-600-200). PDSCs were sized to support the rectifiers. Automatic breakers were sized based on historical data for a typical office and sized to handle the power plant in this study. The engine is sized to carry power plants required for telecommunications equipment and associated HVAC equipment.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Set #9

DATED: May 18, 2001

ITEM: ATT 9-1 Please indicate where in Verizon's current cost study it has provided the costs for the various components needed for it to provide line splitting in conjunction with UNE-P.

- a) If Verizon has not submitted line splitting costs in conjunction with a UNE-P scenario, please explain in detail why it has not done so and whether it intends to do so at a later date.

If Verizon believes that it is not required to submit line splitting costs in conjunction with a UNE-P scenario, explain whether Verizon believes its position conforms with the Department's 98-57 Phase III-A Decision issued on January 8, 2001. If so, explain why.

REPLY: The Department has ruled that Verizon MA is required to provide line splitting only in accordance with FCC rules. See D.T.E. 98-57, Phase III-B Clarification Order. The FCC has ruled that line splitting constitutes a new configuration of loop, splitter and switching elements that enables a CLEC alone or with another CLEC to provide voice and data services over a single loop, but it is not a configuration in which the UNE-P arrangement remains intact. See *Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Third Report and Order on Reconsideration in CC Docket No. 98-147, Fourth Report and Order on Reconsideration in CC Docket No. 96-98 (January 19, 2001). Verizon MA submitted recurring and nonrecurring cost studies for loop and switching elements as well as splitter-related recurring costs.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

**Respondent:
Title:**

REQUEST: AT&T Communications of New England, Set #9

DATED: May 18, 2001

ITEM: ATT 9-2 Can a certified local exchange carrier ("CLEC") that wishes to purchase line splitting in conjunction with UNE-P, purchase the line sharing functionalities referred to in the Panel testimony in Section VII, C, 4?

- (a) If the answer is yes, please explain in detail what line sharing rate elements are available for purchase in a UNE-P/line splitting scenario.
- (b) If the answer is no, please explain in detail why, in light of the fact that line splitting and line sharing are similar, a CLEC cannot purchase line sharing rate elements for use in a UNE-P/line splitting scenario.

REPLY: Please see Verizon MA's response to Information Request AT&T 9-1.

VZ # 367